

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA

UNITED STATES COUNCIL FOR WORLD )  
FREEDOM, )  
 )  
Plaintiff, )  
 )  
v. ) CIVIL ACTION NO. 88-0095-JHP  
 )  
UNITED STATES OF AMERICA, )  
 )  
Defendant. )

DEFENDANT'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS TO PLAINTIFF

TO: United States Council for World Freedom  
c/o Thomas R. Spencer, Jr., Esquire  
Spencer, Bernstein, Seeman & Klein  
Suite 1901  
801 Brickell Avenue  
Miami, Florida 33131

Robert P. Kelly, Esquire  
Office of John P. Sears  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

Defendant requests, pursuant to Rule 34, Federal Rules of Civil Procedure, that the following documents be produced by plaintiff for inspection by defendant. Production may be accomplished by providing copies of the documents on July 25, 1988, at the office of defendant's attorneys, Room 6838, 555 4th Street, Washington, D.C. 20001 or by mail addressed to Tax Division, United States Department of Justice, P.O. Box 227, Ben Franklin Station, Washington, D.C. 20044. For purposes of this request for production of documents, any reference to "CFWF" shall be deemed a reference to the United States Council for World Freedom, plaintiff herein.

REQUEST NO. 1: The articles of incorporation of CFWF.

REQUEST NO. 2: The by-laws of CFWF.

REQUEST NO. 3: Any and all amendments or modifications to the articles of incorporation or by-laws of CFWF.

REQUEST NO. 4: The minutes of any and all board of directors meetings, and minutes of any other meetings of officers of CFWF during the year beginning January 1, 1985 and for all years subsequent to the present date.

REQUEST NO. 5: All financial statements of CFWF for the years begining January 1, 1985 through the present date, including balance sheets and profit and loss statements.

REQUEST NO. 6: All general journals, ledgers, reconciliations, statements, and the like, of CFWF for the years beginning January 1, 1985 through the present date.

REQUEST NO. 7: All documents or writings of any kind, including receipts, ledgers, etc., which document the receipt of funds and/or property from donations by CFWF during the years beginning January 1, 1985 through the present date.

REQUEST NO. 8: All documents or writings of any kind which document the expenses of and uses of money by CFWF for the years beginning Janaury 1, 1985 through the present date.

REQUEST NO. 9: All documents of any kind which document expenditures for charitable donations of property by CFWF for the years beginning January 1, 1985 through the present date.

REQUEST NO. 10: All documents of any kind which document non-charitable expenditures of CFWF for the years beginning January 1, 1985 through the present date.

REQUEST NO. 11: All bank statements, cancelled checks, and deposit records for any account of CFWF for the years beginning January 1, 1985 through the present date.

REQUEST NO. 12: Copies of all soliciations, promotional material and advertisements used by the CFWF from January 1, 1985 through the present date.

REQUEST NO. 13: Copies of all form letters or applications, brochures and explanatory material sent by CFWF to prospective contributors for the years January 1, 1985 through the present date.

REQUEST NO. 14: A list of all members and contributors to CFWF for all years from January 1, 1985 through the present date.

REQUEST NO. 15: Copies of all newsletters or other correspondence with contributors or members of CFWF for years beginning January 1, 1985 through the present date.

REQUEST NO. 16: Copies of all payroll records or other documents showing the names of employees and the amount of compensation paid for the years beginning January 1, 1985 through the present date.

REQUEST NO. 17: All correspondence between Steadman Fagoth and CFWF.

REQUEST NO. 18: All correspondence between Shapoor Ardalen and CFWF.

REQUEST NO. 19: All correspondence between Eden Pastora and CFWF.

REQUEST NO. 20: All cancelled checks or other evidence of payments made to Steadman Fagoth, Shapoor Ardalan or Eden Pastora.

REQUEST NO. 21: All correspondence between Ellen Garwood and CFWF.

REQUEST NO. 22: The transcript of all speeches or interviews of John K. Singlaub since January 1, 1982 through the present date.

REQUEST NO. 23: Any correspondence or other writings to CFWF requesting assistance or support.

REQUEST NO. 24: All documents submitted by John K. Singlaub for reimbursement of expenses incurred during travel on behalf of CFWF from January 1, 1985 through the present date.

REQUEST NO. 25: Bank statements, deposit slips, and cancelled checks (with check register) of all bank, savings, money market, and/or investment accounts of CFWF for which officers of CFWF have signature authority during the period January 1, 1985 through the present date.

REQUEST NO. 26: All documents that describe the controls or procedures established by CFWF to ensure that charitable aid provided by CFWF would be (1) used only for charitable purposes and (2) received by the intended beneficiary.

REQUEST NO. 27: All documents that describe the criterion used by CFWF in determining the recipients of charitable aid.

REQUEST NO. 28: All documents that verify the expenses attributable to the "Nicaragna Special Fund" shown in Part III of the Return of Orginaization Exempt From Income Tax (Form 990) of CFWF for the years ending Decmeber 31, 1985, 1986 and, 1987 if applicable.

REQUEST NO. 29: All documents that verify the expenses attributable to the "Afghanistan Special Fund" shown in Part III of the tax Return of Organization Exempt From Income Tax (Form 990) of CFWF for the years ending December 31, 1985, 1986 and, 1987 if applicable.

REQUEST NO. 30: The applications or other documents provided to the United States Department of State regarding the overseas use of the helicopters named the "Lady Ellen" and the "Freedom Fighters".

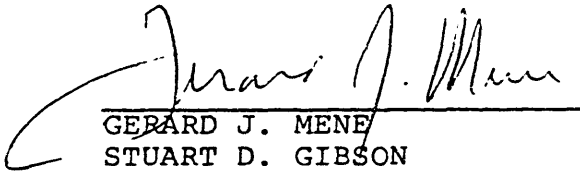
REQUEST NO. 31: The helicopter flight logs or other documentation of the use of the helicopters named "Lady Ellen" and the "Freedom Fighter."

REQUEST NO. 32: All records relating to "Project Boots", including all documents which show or relate to CFWF's providing boots or shoes as a form of charitable aid.

REQUEST NO. 33: All documents submitted by Edward Dearborn for reimbursement of expenses incurred on behalf of CFWF from January 1, 1985 through the present date.

REQUEST NO. 34: All documents submitted by Karl Phaler for reimbursement of expenses incurred on behalf of CFWF from January 1, 1985 through the present date.

REQUEST NO. 35: All documents submitted by Bill Kenney for reimbursement of expenses incurred on behalf of CFWF from January 1, 1985 through the present date.

A handwritten signature in dark ink, appearing to read "Gerard J. Mene", is written over a horizontal line.

GERARD J. MENE  
STUART D. GIBSON  
Attorneys, Tax Division  
U.S. Department of Justice  
P.O. Box 227  
Benjamin Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 724-7881  
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OF COUNSEL:

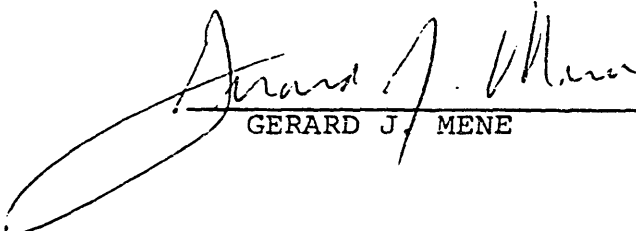
JAY B. STEPHENS  
United States Attorney

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a copy of the foregoing  
DEFENDANT'S FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS TO  
PLAINTIFF was mailed by United States mail, postage prepaid, this  
21 day of June, 1988, addressed to:

THOMAS R. SPENCER, JR., ESQUIRE  
Spencer, Bernstein, Seemann and Klein, P.C.  
801 Brickell Avenue, Suite 1901  
Miami, Florida 33131

ROBERT P. KELLY, ESQUIRE  
Office of John P. Sears  
818 Connecticut Avenue, N.W.  
Washington, D.C. 20006

  
GERARD J. MENE